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To: NOP Livestock
Subject: Pasturing requirements

My name is Martin Jaus, and I am an organic dairy farmer from Gibbon Minnesota. I want to comment on the pasturing issue you are now considering.

In recent years I've begun to see research on the positive impact of grazing as it relates to nutritional content (primarily CLA's, and Omega 3's) of food products from grazed animals. Although I have not seen any studies correlating the specific time on pasture or the % of DMI with the levels of these beneficial components, all indications are that the more influence put on grazing, the higher these nutrient levels are.

I support the 120 day, 30% DMI proposal. We farm in Minnesota which is in the most northern tier of continental US grazing. Even here though, we graze approximately 180 days. It would appear that 120 days on pasture would be a lenient standard everywhere else. 30% DMI perhaps should be an average over the grazing season as conditions can vary substantially over the grazing season. Still, 30% seems to me to be a lenient number, one easily achievable by anyone serious about grazing.

Lactation should be removed as a "stage" of production where pasturing is concerned. A lactating cow is precisely one that needs to be on pasture, though allowances should be made for individual animals for short periods of time for health related concerns. Allowances should also be made for weather related conditions that might potentially cause harm to either the animal, or the pasture, but again, these should be for short periods of time. The exemption for animals under six months is good because the young animals' digestive system hasn't matured to the point of being able to handle a full pasture diet. I don't think mandatory stocking rates should be included because there is too much variance across the country, and I think a standard for DMI would address this.

Consumer confidence in organics is a big issue and pasturing plays a major role. Consumers purchase organic livestock products for four main reasons.

- 1) What organics DOES NOT contain--things like pesticides, synthetic hormones, antibiotics etc.
- 2) What organics DOES contain--the additional health benefits such as the CLA and Omega 3's.
- 3) Animals welfare concerns. Consumers want animals on pasture where they can exhibit their natural behaviors and benefit from consuming the foods in the form and manner in which their systems were designed to accommodate vs. animals raised in confinement settings.
- 4) Environmental concerns. Grazing protects our soil and water resources, provides wildlife habitat, and minimizes use of fossil fuels and other detrimental inputs on this land.

If you look at these four issues, the last three are contingent on grazing. Without a strong, consistent and persistent mandate for pasturing, consumer confidence will erode.

My last issue would be the role of certifiers and the importance of assuring that they be given the power to enforce a rule that assures the prominent role of grazing in organic production.

Thank you for your consideration.

Martin Jaus

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